

Exhibit A

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

IN RE: CENTURYLINK RESIDENTIAL CUSTOMER BILLING DISPUTES LITIGATION This Document Relates to: ALL ACTIONS	MDL No. 17-2795 (MJD/KMM) PLAINTIFFS' PROPOSED INITIAL CASE MANAGEMENT ORDER
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1. **Proposed Case Schedule:** Plaintiffs have met and conferred with Defendants regarding preliminary case scheduling and agreed upon the following proposal, subject to approval by the Court:

Action/Event	Proposed Date
Plaintiffs file Consolidated Complaint	February 15, 2018
Parties hold Rule 26(f) conference and meet and confer on deadlines for Defendants' response to Consolidated Complaint	March 1, 2018
Parties submit Rule 26(f) report to Court, including deadlines for Defendants' response to Consolidated Complaint	March 8, 2018
Court holds status conference	March 2018
Parties meet and confer regarding ESI and Discovery Protocols, confidential document repository, Protective Order, identification of defendants, preliminary informal discovery	December 2017 – March 2018

2. **Discovery and Electronically Stored Information (“ESI”):** Pursuant to the proposed schedule, the parties will meet and confer regarding an appropriate protocol for the production of ESI, including agreement on a document production format that is search-capable, and the establishment of a confidential document repository.

3. **Service of Process:** The parties have agreed to accept service of process upon timely request.

4. **Coordination with State Court Litigation:** The parties agree that, to the extent practicable, they will coordinate these proceedings with related state court litigation, if any.

5. **Management of Class Action Litigation:** Pursuant to the proposed schedule herein, the parties will submit a proposal to the Court for an appropriate schedule to effectively coordinate the discovery, experts, and briefing necessary for resolving any motion for class certification.

Dated: December 7, 2017

Respectfully submitted,

By: ZIMMERMAN REED LLP

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